

UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

IVA HAUKENES,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES
LLC; EXPERIAN INFORMATION
SOLUTIONS, Inc.; TRANS UNION LLC;
NEXTELL WEST Corp.; and ENHANCED
RECOVERY COMPANY LLC,

Defendant.

No. 3:11-cv-05535-BHS

MOTION TO CONTINUE TRIAL
AND TO REVISE RELEVANT
DATES

COMES NOW, the Plaintiff, IVA HAUKENES, by and through her attorney of record, NIGEL S. MALDEN, and hereby moves the court to continue the trial date and all other relevant deadlines by at least 90 days.

I. Relief Requested

Continuance of the trial date and all other relevant deadlines for 90 days.

Timeline as follows:

1. Depositions completed by October 29, 2012;
2. Dispositive motions filed by November 30, 2012;

Motion to Continue Trial and to
Revise Relevant Dates

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3. Settlement conference held no later than December 28, 2012;
4. Mediation held no later than January 17, 2013;
5. Letter of compliance as to Local Rule CR 39.1 filed by January 28, 2013;
6. Motions in limine filed by January 21, 2013;
7. Agreed to pretrial order filed by February 4, 2013;
8. Pretrial conference will be held at 2:30 p.m. on February 18, 2013; and
9. Four (4) day trial set for 9:00 a.m. on February 26, 2013.

II. Reason for Request

The gist of the motion is that one (1) of the key witnesses (Plaintiff IVA HAUKENES spouse, STEVEN CHASE) must undergo spinal surgery on August 1, 2012 and is unavailable for deposition until probably September. The parties cannot fairly complete discovery, prepare dispositive motions or prepare for trial without this additional time.

III. Evidence Relied Upon

This motion is based upon the accompanying Declaration of Nigel S. Malden and the records and files herein.

DATED: This 20 day of July, 2012.



NIGEL S. MALDEN, WSBA #15643
Attorney for plaintiff Iva Haukenes

CERTIFICATE OF SERVICE

I hereby certify that the following documents:

- Motion to Continue Trial and Revise Relevant Dates;
- Declaration of Nigel S. Malden in Support of Plaintiff's Motion to Continue Trial and Related Dates;
- *Proposed* Order Re: Trial Continuance

were forwarded on this 20th day of July, 2012, for service upon:

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I declare that under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED: this 20th day of July, 2012.


Janavieve L. Cook
Legal Assistant to Nigel S. Malden

Declaration of Service

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